

AR 201-12009

**KOPPERS
INDUSTRIES**

Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800

Telephone: (412) 227-2001

December 2, 1999

4pp
Joseph S. Carra
Deputy Director, Office of Pollution Prevention and Toxics [7401]
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Re: Request to Remove "Fuel gases, coke oven" (CAS No. 65996-81-8)
from the HPV List

Dear Mr. Carra:

I am writing in support of the letter dated November 30, 1999, that is being submitted to you by the American Coke and Coal Chemicals Institute (ACCCI). In that letter, ACCCI requests that EPA remove two substances from the list of chemicals subject to testing under the HPV program. Those two substances are "Fuel gases, coke oven" (CAS No. 65996-81-8) and "Ammonia liquor (coal)" (CAS No. 65996-80-7). I am writing with respect to ACCCI's request to remove fuel gases, coke oven from the HPV list.

Koppers Industries, Inc. reported production of fuel gases, coke oven (CAS No. 65995-81-8) (hereinafter referred to as "coke oven fuel gas") for the 1990, 1994 and 1998 IUR reporting cycles. This letter will confirm that Koppers Industries, Inc. produces coke oven fuel gas without separate commercial intent, as a byproduct of the production of coke from coal. After coke oven fuel gas is generated in the coking process, the gas is recycled back to the coke oven battery where it is burned as a fuel. This is the only commercial purpose for which coke oven fuel gas is produced by Koppers Industries, Inc. Moreover, Koppers Industries, Inc. does not anticipate producing coke oven fuel gas for any purpose or in any manner other than as described above. Accordingly, none of the coke oven fuel gas produced by Koppers Industries, Inc. should be counted toward the 1 million pound threshold for designation as an HPV chemical.

If you have any questions regarding this letter submission or if you desire additional information pertaining to Koppers Industries, Inc. production of coke oven fuel gas, please contact me at 412-227-2708.

Sincerely,

Kevin J. Fitzgerald
Vice President & General Manager
Carbon Materials and Chemicals Division

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Joseph S. Carra
December 2, 1999
Page 2

cc: Charles M. Auer
David C. Ailor

December 2, 1999

Joseph S. Carra
Deputy Director, Office of Pollution Prevention and Toxics [7401]
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

**Re: Request to Remove "Ammonia liquor (coal)"
(CAS No. 65996-80-7) From The HPV List**

Dear Mr. Carra:

I am writing in support of the letter dated November 30, 1999, that is being submitted to you by the American Coke and Coal Chemicals Institute (ACCCI). In that letter, ACCCI requests that EPA remove two substances from the list of chemicals subject to testing under the HPV program. Those two substances are "Fuel gases, coke oven" (CAS No. 65996-81-8) and "Ammonia liquor (coal)" (CAS No. 65996-80-7). I am writing with respect to ACCCI's request to remove ammonia liquor (coal) from the HPV list.

Koppers Industries, Inc. reported production of ammonia liquor (coal) (CAS No. 65996-80-7) (hereinafter referred to as "ammonia liquor") for the 1990, 1994 and 1998 IUR reporting cycles. This letter will confirm that Koppers Industries, Inc. produces ammonia liquor without separate commercial intent, as a byproduct of the production of coke from coal. Ammonia liquor generated in the coking process is processed to extract component chemical substances, notably ammonia. Any remaining ammonia liquor is disposed of as waste. Further Koppers Industries, Inc. does not anticipate producing ammonia liquor for any purpose or in any manner other than as described above. Therefore, none of the ammonia liquor produced Koppers Industries, Inc. should be counted toward the 1 million pound threshold for designation as an HPV chemical.

If you have any questions regarding this letter submission or if you desire additional information pertaining to Koppers Industries, Inc. production of ammonia liquor, please contact me at 412-227-2807.

Sincerely,

Kevin J. Fitzgerald
Vice President & General Manager
Carbon Materials and Chemicals Division

Joseph S. Carra
December 2, 1999
Page 2

cc: Charles M. Auer
David C. Ailor